

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

IN RE:

DEONDRA FREEMAN  
SSAN: XXX-XX-9813

Case No. 17-31144-DHW  
Chapter 13

Debtor(s)

**TRUSTEE'S OBJECTION TO CONFIRMATION**

COMES NOW, the Trustee, and pursuant to 11 U.S.C. §1325 objects to confirmation of the debtor(s) plan as filed. As grounds for said objection, the Trustee states as follows:

1. The debtor(s) filed a petition seeking relief under Chapter 13 of the United States Bankruptcy Code on April 21, 2017.
  2. The debtor(s) §341 Meeting of Creditors was held June 08, 2017.
  3. The debtor(s) overall pay record is 100%.
- (X) The plan fails to pledge non exempt lawsuit proceeds from a class action vs. Wells Fargo.

WHEREFORE, the above premises considered, Trustee objects to confirmation of the debtor(s) plan and requests that either confirmation be denied or the case be continued until such time as the above referenced issues have been resolved.

Respectfully submitted this July 03, 2017.

Sabrina L. McKinney  
Chapter 13 Standing Trustee

By: /s/ Tina J. Hayes

Tina J. Hayes  
Staff Attorney

Office of the Chapter 13 Trustee  
P.O. Box 173  
Montgomery, AL 36101-0173  
Phone: (334)262-8371  
Fax: (334)262-8599  
email: hayest@ch13mdal.com

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I have served a copy of the foregoing Trustee's Objection to Confirmation on the parties listed below by either electronic mail or by placing same in the U.S. Mail, postage prepaid and properly addressed this July 03, 2017.

Copy to: DEBTOR(S)  
RICHARD D SHINBAUM

*/s/ Tina J. Hayes*

---

Tina J. Hayes  
Staff Attorney